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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

UNITED STATES OF AMERICA

1:23-cr-00254-MC

v.

**GOVERNMENT'S PROPOSED
VOIR DIRE QUESTIONS**

**NEGASI ISHAIAH ZUBERI, aka
JUSTIN JOSHUA HYCHE,**

Defendant.

The United States of America respectfully requests, pursuant to Rule 24(a) of the Federal Rules of Criminal Procedure, that the government be allowed to include the following questions in its examination of prospective jurors, and to address their responses to the jury questionnaire and discuss whether a particular fact or circumstance would influence a juror in favor or against either the United

States or Mr. Zuberi. The government requests leave to ask prospective jurors appropriate follow-up questions based on their responses to the questionnaire and the Court's inquiry.

1. Do you have strong feelings towards the United States government, the U.S. Department of Justice, the U.S. Attorney's Office, or any other federal government entities?
2. Do you have a strong opinion about the role that the federal government currently has in the United States?
3. Do you have an opinion on federal versus state prosecution of crimes?
4. Do you believe that the judicial system in general is fair or unfair?
5. The charges in this case involve kidnapping, transportation for criminal sexual activity and felon in possession of a firearm or ammunition. Is there anything about the nature of the charges or the nature of the evidence you may hear that causes you to believe that you cannot sit as a fair and impartial juror in this case?
6. As a juror, you will be asked to make a decision regarding Mr. Zuberi's intent. Do you have any concerns as to whether you can do so?
7. Do you have concerns about working with a group or coming to a consensus?
8. If you disagree with the law or any jury instructions in this case, can you set aside your personal beliefs and follow the law and instructions as given to you by the Court?
9. Do you have any difficulty based on your beliefs deciding whether a person is guilty or not guilty?
10. Do you agree that both parties—Mr. Zuberi and the United States—have the right to a fair trial?
11. Is there any reason that you cannot sit as a fair and impartial juror in this case?

The government reserves the right to submit such additional requested questions as may become necessary during the course of the Court's voir dire examination.

Dated: August 5, 2024

Respectfully submitted,

NATALIE K. WIGHT
United States Attorney

/s/ Jeffrey S. Sweet
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